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UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,	)	CASE NO. CR 16-0483WHA
	)	
Plaintiff,	)	STIPULATION AND ORDER [PROPOSED]
	)	
v.	)	
	)	
MICHAEL FLYNN HARRIS,	)	
	)	
Defendant.	)	
	)	

Plaintiff, the United States of America, and defendant, Michael Flynn Harris, hereby stipulate that the status hearing currently scheduled for March 7, 2017 shall be continued to March 28, 2017 at 2:00 p.m. The reason for the requested continuance is the parties are attempting to resolve the case and they need additional time to review and calculate financial figures that will bear on the proposed resolution. Counsel for defendant is scheduled to select a jury in *United States v. Jacobs*, CR 16-0299 CRB on March 14, 2017, and is set for trial in that same matter on March 20, 2017. The first date that counsel for both parties are available for a change of plea or setting of further dates is March 28, 2017 at 2:00 p.m. The parties further stipulate that the time from March 7, 2017 through March 28, 2017 should be excluded from the Speedy Trial Clock because a failure to grant the continuance would deny counsel the reasonable time necessary for effective preparation, taking into account the exercise of due diligence,

STIP AND ORDER  
CR 16-0483 WHA

1 and under the circumstances the ends of justice served by a reasonable continuance outweigh the best  
2 interest of the public and the defendant in a speedy trial under 18 U.S.C. § 3161(h)(7)(B)(iv).

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4  
5 DATED: March 1, 2017

Respectfully submitted,

6 BRIAN J. STRETCH  
United States Attorney

7  
8 /s/  
ROBIN L. HARRIS  
9 Assistant United States Attorney

10  
11 /s/  
ELLEN LEONIDA  
12 Attorney for Defendant

13  
14 ORDER

15 The parties having so stipulated and GOOD CAUSE APPEARING, IT IS HEREBY ORDERED  
16 that the hearing scheduled for March 7, 2017 is continued to March 28, 2017 at 2:00 p.m. IT IS  
17 FURTHER ORDERED that the time from March 7, 2017 through March 28, 2017 should be excluded  
18 from the Speedy Trial Clock because a failure to grant the continuance would deny counsel the  
19 reasonable time necessary for effective preparation, taking into account the exercise of due diligence,  
20 and under the circumstances the ends of justice served by a reasonable continuance outweigh the best  
21 interest of the public and the defendant in a speedy trial under 18 U.S.C. § 3161(h)(7)(B)(iv).

22  
23  
24 IT IS SO ORDERED.

25  
26 WILLIAM ALSUP  
United States District Court Judge